

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MONSANTO COMPANY, PHARMACIA, LLC, and SOUTIA, INC.,)	
)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MAGNETEK, INC.,)	
GENERAL ELECTRIC CO.,)	CASE NO: 4:23-cv-00204-HEA
PARAMOUNT GLOBAL,)	
KYOCERA AVX COMPONENTS)	
CORPORATION,)	
CORNELL-DUBILIER ELECTRONICS, INC.,)	
and THE GILLETTE COMPANY, LLC,)	
)	
Defendants.)	

CONSENT MOTION FOR EXTENSION OF TIME

Defendants General Electric Co. (“GE”), Paramount Global (“Paramount”), Kyocera AVX Components Corporation (“KAVX”), Cornell-Dubilier Electronics, Inc. (“CDE”), and The Gillette Company, LLC (“Gillette”) (together, “Moving Defendants”), with consent of counsel for Plaintiffs Monsanto Company, Pharmacia, LLC, and Solutia, Inc. (“Plaintiffs”), respectfully move this Court for an extension of time within which to answer or otherwise respond to Plaintiffs’ First Amended Petition (ECF No. 4). In support of this motion, the Moving Defendants state as follows:

1. Defendant GE removed this action from the Circuit Court of St. Louis County, Missouri to this Court pursuant to 28 U.S.C. § 1442(a)(1) on February 20, 2023.
2. On February 27, 2023, this Court Granted the Moving Defendants’ first Consent Motion for Extension of Time to respond to Plaintiffs removed First Amended Petition in this Court. (ECF No.14.) Defendants’ current deadline for response, as extended, is March 31, 2023.

3. Plaintiffs filed their Motion to Remand on March 21, 2023. (ECF No. 52.)
4. Plaintiffs' counsel has consented to the Moving Defendants' requests for a further extension of time to May 1, 2023, within which to answer or otherwise respond to the First Amended Petition in this Court.

5. No party will be prejudiced by this extension.

WHEREFORE, the Moving Defendants respectfully request an extension of time to May 1, 2023, within which to answer or otherwise respond to the First Amended Petition (ECF No. 4).

Dated: March 28, 2023

Respectfully submitted,

WHEELER TRIGG O'DONNELL LLP

/s/ Peter W. Herzog III
Peter W. Herzog III (Mo. Bar No. 36429)
One Metropolitan Square
211 N. Broadway, Suite 2825
St. Louis, MO 63102-2723
(314) 326-4129
(303) 244-1879 fax
pherzog@wtotrial.com

Michael L. O'Donnell (*Pro Hac Vice*)
Erik David Nadolink (*Pro Hac Vice*)
Marissa S. Ronk (*Pro Hac Vice*)
370 Seventeenth Street, Suite 4500
Denver, CO 80202-5647
(303) 244-1800
(303) 244-1879 fax
herzog@wtotrial.com
odonnell@wtotrial.com
ronk@wtotrial.com

Attorneys for Defendant General Electric Co.

CARMODY MACDONALD P.C.

/s/ Gerard T. Carmody

Gerard T. Carmody, #24769MO
David M. Fedder, #38823MO
Tyler C. Schaeffer, #60847MO
120 South Central Avenue, Suite 1800
St. Louis, Missouri 63105
Telephone (314) 854-8600
Facsimile (314) 854-8660
gtc@carmodymacdonald.com
dmf@carmodymacdonald.com
tcs@carmodymacdonald.com

WEIL, GOTSHAL & MANGES LLP

Yehudah Lev Buchweitz (*Pro Hac Vice*)
Cameron Mae Bonk (*Pro Hac Vice*)
767 Fifth Avenue
New York, NY 10153
Telephone (212) 310-8256
Facsimile (212) 310-8007
yehudah.buchweitz@weil.com
cameron.bonk@weil.com

EVERT WEATHERSBY HOUFF

C. Michael Evert, Jr. (*Pro Hac Vice*)
3455 Peachtree Road NE, Suite 1550
Atlanta, GA 30326
Telephone (678) 651-1200
Facsimile (678) 651-1201
CMEvert@ewhlaw.com

Christopher G. Conley (*Pro Hac Vice*)
200 Cleveland Road, Suite 6
Bogart, GA 30622
Telephone (706) 389-7311
Facsimile (706) 389-7301
CGConley@ewhlaw.com

Attorneys for Defendant Paramount Global

GM LAW PC

/s/ David B. Helms

David B. Helms (Mo. Bar No. 48941)
8000 Maryland Avenue, Suite 1060
St. Louis, MO 64105
(314) 474-1750
(816) 471-2221 fax
davidh@gmlawpc.com

Benjamin D. Mooneyham (Mo. Bar No. 65341)
1201 Walnut Street, Suite 2000
Kansas City, MO 64106
(816) 471-7700
(816) 471-2221 fax
benm@gmlawpc.com

MINTZ LEVIN PC

LisaMarie F. Collins (*Pro Hac Vice*)
Kaitlyn A. Crowe (*Pro Hac Vice*)
Nicholas A. Butto (*Pro Hac Vice*)
919 Third Avenue
38th Floor
New York, NY 10022
(212) 935-3000
lfcollins@mintz.com
kacrowe@mintz.com
nabutto@mintz.com

Attorneys for Defendant Kyocera AVX Components Corporation

**SEGAL MCCAMBRIDGE SINGER &
MAHONEY, LTD.**

/s/ Benjamin J. Wilson

Benjamin J. Wilson, Esq. (E.D.Mo. Bar No. 63329MO)
8112 Maryland Ave., Suite 400
St. Louis, MO 63105
(314) 300-5780
(312) 645-7711 fax
moassociates@smsm.com
bjwilson@smsm.com

FOLEY HOAG LLP

Jonathan M. Ettinger (*Pro Hac Vice*)
Aaron Frederick Lang (*Pro Hac Vice*)
155 Seaport Boulevard
Suite 1600
Boston, MA 02210
(617) 832-1000
(617) 832-7000 (fax)
jettinger@foleyhoag.com
alang@foleyhoag.com

*Attorneys for Defendant Cornell-Dubilier Electronics,
Inc.*

GOLDBERG SEGALLA LLP

/s/ John M. Allen

John M. Allen, #49642MO
Saran B. Mangelsdorf, #59918MO
8000 Maryland Avenue, Suite 640
St. Louis, MO 63105
314-446-3350
Fax: 314-446-3360
jallen@goldbergsegalla.com
smangelsdorf@goldbergsegalla.com

Attorneys for Defendant The Gillette Company, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2023, the foregoing was served on all counsel of record via this Court's electronic filing system.

/s/ Gerard T. Carmody _____